In regards to proposal RM-11306: I am opposed to this proposal in its current form. I feel that the general principle of bandplans by bandwidth rather than emission type has some merit. However, this particular proposal has some serious flaws.

First, I strongly oppose allowing "semi-automatic" digital signals across huge swaths of the amateur spectrum as proposed. These stations should be restricted to relatively small segments set aside for automatic operation of digital stations. The potential for interference with other communications far outweighs any possible benefits to the Amateur Service by allowing these stations to operate in the huge segments suggested. The technology does not exist to prevent this interference by these stations. This is already a growing problem; the proposed changes would make it much worse.

I also oppose allowing wide-band signals on the 30M amateur band. This is inconsistent with current use and international agreement concerning allowable emissions on these frequencies.

I take strong exception to the proposed band plan for the 40M segment of the spectrum. Insufficient room has been left for narrow-band modes at the lower end of this band. I would suggest 7.000-7.055 as a reasonable segment for 200Hz operation. This would allow for protection of narrow-bandwidth users from encroaching wider-bandwidth modes. The proposed cutoff of 7.035 for the top of the 200 Hz bandwidth limited segment does not allow enough room for current users of this segment. Current regulations only allow General Class licensees to operate down to 7.025. The ARRL-proposed band plan would only allow a 10Khz wide slice of protected narrow-band spectrum for these users. This is insufficient to support existing activity.

In summary, I generally support the concept of 'regulation by bandwidth'. However, I feel the current proposal has been written with far too much emphasis placed on semi-automatic digital modes, at the expense of all other existing users. These wide-bandwidth digital modes are not spectrum efficient, and 'semi-automatic' operation is fraught with interference problems that cannot be resolved with current technology. The nature of HF signal propagation modes would virtually assure much greater incidences of interference with ongoing communications if these proposed changes were approved. All automatic (and 'semi-automatic') modes should be limited to relatively narrow band segments, consistent with the narrow scope of their use, compared with general Amateur Radio activity.

Thank you for your consideration of these comments.

Regards,

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